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**COMISION PARA LA INVESTIGACION Y DEFENSA DE LAS
HORTALIZAS DE SINALOA**

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Culiacan, Sinaloa, Mexico, March 01, 2004

Standardization Section, Fresh Products Branch
Fruit and Vegetable Programs
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The Confederacion de Asociaciones Agricolas del Estado de Sinaloa, (CAADES) endorses the efforts of the U.S. Department of Agriculture to modernize the U.S. standards for grades of greenhouse tomatoes as proposed in the *Federal Register*. The classification of defects by count instead of by weight should speed the inspection process for greenhouse tomatoes. However, the proposal to use diameters as the basis to establish sizes, may work against the efforts to speed the inspection process and create significant weight differences in product using the current industry standard sized box. CAADES also wishes to identify areas related to the development of the greenhouse tomato industry that have made the standard less relevant.

CAADES represents the greenhouse tomatoes grown all over the state of Sinaloa. At present Sinaloa represents approximately 25 percent of greenhouse tomato area in Mexico.

It is our understanding from our meeting with David Priester at the recent North American Tomato Trade Working Group meetings that the deadline for comments relating to the standard was delayed. This delay has allowed us to develop a more complete response to the USDA notice. We appreciate your consideration and acceptance of our comments.





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CAADES supports the move from calculated percentage of defects based on the weight of each tomato in the lot with a defect to a system based on the count of tomatoes within the lot with the defect. CAADES agrees that this change would significantly speed the inspection process for greenhouse tomatoes with no change to the integrity of the inspection process.

CAADES opposes efforts to use the grade standard as the vehicle to define the greenhouse industry. The revision to the standard needs to focus on the product itself and helping the trade communicate quality and condition of greenhouse tomatoes in a more uniform manner. A grade standard should not be used to mandate marking requirements. CAADES is also concerned that many proposed definitions discussed during NATTWG meetings of "greenhouse" severely limit the evolution of the industry through new and improved technologies adapted to each growing region. For example, most greenhouses in Sinaloa are equipped with an extra shade screen in addition to the roof of the structure to reduce the amount of sunlight reaching the plants; however, greenhouses in zones with less abundant sunlight do not need this technology and would be wasting money to install it in their structures. Thus, there will be some variation between regions that will dictate the appropriate combination of technology for their specific operations. CAADES believes that it may in fact be counterproductive to attempt to create a definition of greenhouses within the grade standard.

CAADES is also concerned with the proposal to use diameters as the method to determine size for the grade standard. Variations in varieties of greenhouse tomatoes produce tomatoes that are relatively taller and thinner as well as some varieties that are shorter and wider. The industry is relatively standardized in using a one-layer pack that is around 15 pounds net weight for beefsteak tomatoes that uses a count methodology to define size. CAADES suggests that the USDA investigate the possibility of using a count size as a basis for determining size, since measuring circumferences would once again slow the process of inspections and might lead to even less standardization within the industry regarding size than exists today.





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CAADES also would like to ensure that the standard is not written in such a way to discourage the innovative use of packaging in marketing greenhouse tomatoes. Just as production technology has changed over the years, so have consumer and retailer demands for new styles of presentation and packaging. CAADES would be opposed to any efforts to limit the grades to only a limited number of box dimensions or pack styles.

CAADES encourages USDA to reexamine destination tolerances during its modernization of the grade standard. Given that greenhouse tomatoes are still ultimately perishable vegetables, CAADES believes that USDA should investigate if time and distance to the delivery point from the shipping point should be similar to those for virtually all other fruit and vegetable standards enforced by USDA.

CAADES stands ready to assist the USDA in coordinating information to and from the Mexican greenhouse tomato producers, who are a main supplier of this product to the United States. In addition, the current greenhouse standards have useful commercial applicability to traditional beefsteak round tomatoes. CAADES is willing to work with USDA to see if additional information could be included in the standard to make it more useful for other varieties of greenhouse tomatoes such as tomatoes-on-the-vine, roma, cherry, grape, and "heirloom" tomatoes that would not be appropriate to be graded against the standard in its current format.

Thank you for accepting the participation of CAADES in this process.

Sincerely,

Lic. Mario H. Robles.
CAADES/CIDH Manager.

Copy: Ing. Enrique Lobo. Minister. Embassy of Mexico Agricultural Office.
SAGARPA. Washington, D.C.